

From: [Steven Moser](#)
To: [glenn.ingoglia](#)
Subject: RE: Barahona v. Nieto
Date: Monday, July 17, 2023 2:33:20 PM

Glenn

Thanks for this. Please also furnish the authorization to obtain the state returns as required by the court's most recent order.

With regard to your request for tax returns, the request is untimely and seeks information that is not relevant to plaintiffs' flsa claims. *See Rosas v. Alice's Tea Cup, LLC*, 127 F. Supp. 3d 4, 11 (S.D.N.Y. 2015)(tax returns are irrelevant and request therefor "would serve no obvious purpose other than intimidation.").

With regard to the request for the deposition transcript, please note that it is available directly from Lexitas. Providing a copy without cost is in violation of our agreement with Lexitas, who is entitled to fees for furnishing same to you under the federal rules.

photo



Steven J. Moser

Managing Attorney, Moser Law Firm, PC

- ☐ [631.759.4054](tel:631.759.4054)
- ☐ [516.671.2776](tel:516.671.2776)
- ☐ [133C New York Avenue, Huntington, NY 11743](#)
- ☐ PO Box 710, Huntington, NY 11743
- ☐ www.moserlawfirm.com
- ☐ steven.moser@moserlawfirm.com

From: glenn.ingoglia <glenn@ingoglia.com>
Sent: Friday, July 14, 2023 6:55 PM
To: Steven Moser <steven.moser@moserlawfirm.com>
Cc: glenn.ingoglia <glenn@ingoglia.com>
Subject: Barahona v. Nieto

Hello Mr. Moser

Attached is a letter along with an executed 4506 form and identification for my client. The above are being mailed to you today and are in full compliance of the Judge's recent order.

Glenn J. Ingoglia, Esq.
THE LAW OFFICE OF
GLENN J. INGOGLIA
104 Long Beach Road
Island Park, New York 11558
(516) 432-0500 Telephone
(516) 432-7333 Facsimile
(516) 298-6279 Mobile
glenn@ingoglia.com
www.ingoglia.com